

LAND AND CHEMICALS DIVISION

Type of Document: 3607 Request for Information

Name of Document: Canton Drop Forge OHD004465142

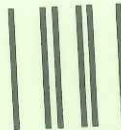
	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>Brian Kennedy</u>	<u>3/20/13</u>
SECTION APA:		
SECTION CHIEF:	<u>Carol L Stancie</u>	<u>3/21/13 4/2/13</u>
BRANCH APA:		
BRANCH CHIEF:		
DIVISION APA:		
DIVISION DIRECTOR:		
OTHERS:	<u>Eaton Weiler ORC</u> <u>(email attached)</u>	<u>3/19/13</u>
DRA:		
RA:		

RETURN TO: Brian Kennedy

PHONE: _____

COMMENTS:
Sent notification to State 4/2/13

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U.S. EPA

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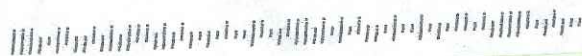
Chgo, IL 60604

Attn: Brian Kennedy

RECEIVED
DIVISION FRONT OFFICE

APR 17 2013

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Brad Akhe
Canton Drop Forge, Inc.
4575 Southway Street SW
Canton, Ohio 44706

2.

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Kris Humble*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

4/10

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

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☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

Kennedy, Brian

From: Weiler, Eaton
nt: Tuesday, March 19, 2013 11:33 AM
o: Kennedy, Brian; Beedle, Michael
Subject: CDF 3007 Draft (ew rev1).docx
Categories: Very Important

Brian,

Sorry for the delay in reviewing this and getting in back to you.

Attached for your review, in redline/strikeout is a revised 3007 for CDF. I basically just added a few requests, restated a few requests, and changed references to the Ponds using "#" (only to be consistent with CDF's terminology). Let me know what you think.

Also, FYI, I have not heard back from Mark on his CWA compliance investigation, and Mickey is still gathering information and has no time set for the completion of the CAA compliance investigation. Cher informed me that she identified no TSCA or EPCRA violations.

-- Eaton



CDF 3007 Draft
(ew rev1).docx



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 05 2013

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL 7009 1680 000 7669 2595
RETURN RECEIPT REQUESTED

Mr. Brad Ahbe
President
Canton Drop Forge, Inc.
4575 Southway Street Southwest
Canton, Ohio 44706

Re: Request for Information
EPA ID No.: OHD004465142

Dear Mr. Ahbe:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Canton Drop Forge, Inc. (hereinafter "CDF" or "you") to submit certain information relating to CDF's response to EPA's Notice of Violation dated January 22, 2013, and the management and storage of used oil at CDF's facility located at 4575 Southway Street Southwest, Canton, Ohio. We are requiring this information to further evaluate the facility's compliance with RCRA, 42 U.S.C. § 6901 et seq., and its implementing regulations set forth in the Code of Federal Regulations and the authorized Ohio Administrative Code. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Brian Kennedy, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

CDF must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the

submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject CDF to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Brian Kennedy, at (312) 353-4383.

Sincerely,



Carol Staniec, Acting Chief
Compliance Section 2
RCRA Branch

Enclosure

cc: Natalie Oryshkewych, OEPA – Northeast District Office
(Natalie.oryshkewych@epa.state.oh.us)

Karen Nesbit, OEPA – Northeast District Office
(Karen.nesbit@epa.state.oh.us)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

In the following requests, "NOV" refers to EPA's Notice of Violation dated January 22, 2013 and "Response" refers to CDF's response to the NOV dated February 20, 2013.

REQUESTS:

1. In the Response, Section A of NOV Item 2 states that the existing oil-water separator at the south end of Forge Shop Building C was originally equipped with coalescing mesh filters. Due to the significant amount of grit in the oil and process water entering the separator, the filter became plugged and was removed.
 - a. State the date of installation of the existing oil-water separator at the south end of Forge Shop Building C.
 - b. State the date that the coalescing mesh filter was removed from the existing oil-water separator.
 - c. Since the date the original mesh filter was removed, has CDF made any attempts to reinstall the mesh filter in the oil-water separator or to find an alternative method to prevent used oil from entering Ponds #1 and #2? If so, please explain all such attempts and provide corresponding documents.
 - d. Please provide the design specifications and capacity (and all corresponding documents) of the existing oil-water separator.
 - e. Please provide all documents used to determine the necessary design specifications and capacity of the existing oil-water separator.
 - f. Please provide a copy of any regulatory document obtained from the state or local municipality on the design, specification, installation and operation of the existing oil-water separator.
2. In the Response, Section B of NOV Item 2 states that Complete Waste Disposal was contracted to remove the existing used oil from Pond #1. Between August 3 and September 20, 2012, Complete Waste Disposal removed 49,300 gallons of used oil and water from the pond over the course of eight shipments.
 - a. Please provide copies of the eight waste manifests used to ship the used oil from CDF's site to Environmental Specialists for recycling.

- b. Please provide all documents of studies and/or plans for the removal used oil from Ponds #1 and #2, and all documents describing the actions taken to remove oil from Pond #1.
 - c. CDF also states that used oil from Pond #2 will be removed in a similar fashion as Pond #1. Please provide a tentative date when CDF plans to remove the used oil from Pond #2.
3. In the Response, Section C of NOV Item 2 states that since August 2012 "substantial efforts have been performed to determine current site conditions and to define a remedy to improve oil-water separation and oil reclamation in order to prevent oil from reaching any of the on-Site ponds." CDF further states that these efforts included engaging TRC Environmental Corp. (TRC) to "perform an engineering study for process and storm water improvements and to develop storm water best management practices."
- a. Please provide all final and (if not yet finalized) draft determinations, studies, and/or reports as described above, and all documents provided by CDF to TRC to undertake any of the above described efforts.
 - b. If not included in the above requested documents, for the time period of January 2005 to the present, please provide detailed description(s) (and corresponding documents) by which each used oil stream enters either Pond #1 or #2, including the location(s), time(s), and quantities the used oil is generated to the location(s) and time(s) and quantities that the used oil enters either Pond #1 or Pond #2.
 - c. If not provided above, for the time period of January 2005 to the present, please provide detailed description(s) (and corresponding documents) on how CDF manages the used oil entering either Pond #1 or Pond #2, including directing used oil to either Pond #1 or Pond #2, transferring water containing used oil from Pond #1 to Pond #2, and skimming used oil from Pond #1 and Pond #2.
4. In the Response, Section D of NOV Item 2 states that TRC completed a Draft VAP Phase I and Draft Phase II Property Assessment in November 2012. The draft reports included the collection of soil, groundwater, sediment and surface water samples.
- a. Please provide a copy of the Draft Phase I Property Assessment completed by TRC, including copies of all documentation utilized to meet the requirements of a Phase I Property Assessment found in OAC 3745-300-06.
 - b. Please provide a copy of the Draft Phase II Property Assessment completed by TCR, including copies of all documentation utilized to meet the requirements of a Phase II Property Assessment found in OAC 3745-300-07.
5. The Response to NOV Item 3 cites a 1995 report by Hammontree & Associates, Limited in which the oily sludge lining Pond #2 was sampled for TCLP VOCs, TCLP SVOCs, TCLP PCBs, TCLP metals, reactive cyanide, reactive sulfur, flash point, pH, paint filter, PCBs and TPH.

- a. Please provide a copy of that report including all analytical results for the constituents mentioned above.
 - b. Please explain all reasons and purposes of CDF's engagement of Hammontree & Associates to complete this report (including all corresponding documents).
6. If not provided in response to a request above, please provide a map of the entire Canton Drop Forge property, including the precise boundaries (prior and present) of the Zone A and Zone B landfills as well as Ponds #1, #2, and #3.
7. Please provide all information and documentation that describes if, at any point in CDF's operating history, waters from Ponds #1, #2, and #3 were ever discharged from CDF's property to the Massillon County publicly owned treatment works or any local waterway.
8. If not provided in response to any of the above requests, please provide a detailed description and corresponding documents of how Ponds #1 and #2 previously and currently comply with RCRA's hazardous waste surface impoundment requirements, as set by the Ohio Administrative Code and the Code of Federal Regulations, including any draft or submitted RCRA permit applications.

Certification

5. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.